

**UNITED STATES DISTRICT COURT  
DISTRICT OF MAINE**

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**TRS RECOVERY SERVICES, INC., and  
TELECHECK SERVICES, INC., Fair  
Debt Collections Practices Act (FDCPA)  
Litigation**  
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**MDL 2426  
Master File Civ. No. 2:13-md-2426-DBH  
  
CLASS ACTION**

*This Document Relates To:*

JEAN LaROCQUE, ex rel. DEIDRE J. SPANG  
v. TRS RECOVERY SERVICES, INC. and  
TELECHECK SERVICES, INC.  
Civ. No. 11-00091-DBH

MELISSA ALLEN v. TRS RECOVERY  
SERVICES, INC. and TELECHECK  
SERVICES, INC.  
Civ. No. 2:11-cv-00091-DBH

**PLAINTIFFS' UNCONTESTED MOTION FOR PRELIMINARY APPROVAL OF  
CLASS ACTION SETTLEMENT AND NOTICE TO CLASS**

Pursuant to Fed. R. Civ. P. 23(c), Plaintiffs Jean LaRocque and Melissa Allen respectfully move this Honorable Court for an Order (1) preliminarily approving the terms of an Agreement of Compromise and Settlement with Defendants TRS Recovery Services, Inc. and TeleCheck Services, Inc. ("Settlement Agreement") as within the range of fair, adequate and reasonable; (2) provisionally certifying two settlement classes and one settlement subclass ("Settlement Classes") for settlement purposes only; (3) approving the notice program and finding that the form and content of the notices of settlement satisfy due process; (4) approving the procedures for members of Settlement Classes to exclude themselves or to object to the settlement; (5) designating counsel for the Settlement Classes; (6) preliminarily enjoining all members of the Settlement Classes, unless and until they have timely and properly excluded themselves from the Settlement Classes, from participating as plaintiffs or class members in any other lawsuits based on, relating to, or

arising out of any of the claims asserted in this case; and, (7) scheduling a hearing date for final approval of the Settlement Agreement.

In support thereof, Plaintiffs rely upon and incorporate by reference the attached Memorandum of Law and Appendix I, including exhibits.

Defendants do not contest the requested relief.

Respectfully submitted,

**FRANCIS & MAILMAN, P.C.**

Date: April 16, 2015

BY:

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**CERTIFICATE OF SERVICE**

I do hereby certify that on this 16th day of April, 2015, I caused a true and correct copy of the foregoing Plaintiffs' Uncontested Motion For Preliminary Approval Of Class Action Settlement And Notice To Class to be served by ECF notification upon the following counsel of record:

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